

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

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ARIEL CURTIS, :
Plaintiff, : CIVIL ACTION NO.:
vs. : 3:21-cv-15-DHB-BKE
CORECIVIC, INC., CORECIVIC :
OF TENNESSEE, LLC, THE :
CITY OF ALAMO, GA, and :
CASANDRA BONEY, :
Defendants. :

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30(b)(6) DEPOSITION OF AMY GARNER

Monday, April 25, 2022

12:40 p.m.

30(b)(6) Deposition of AMY GARNER, was held
remotely via Zoom videoconference, commencing at 12:40
p.m., on Monday, April 25, 2022, and taken down
stenographically by Elizabeth Mingione, Certified and
Registered Professional Reporter for the State of
Georgia.

Job No.: 115860

Pages: 1 - 85

1 Q. Okay. Do you keep a daily calendar or
2 diary?

3 A. No.

4 Q. And the -- what is the primary business of
5 CoreCivic of Tennessee?

6 A. The management of correctional facilities
7 at local, state, federal levels.

8 Q. How many correctional facilities does CCT
9 manage?

10 A. Oh, I cannot give you an absolute number.

11 Q. Is it more than five?

12 A. Yes.

13 Q. More than 10?

14 A. Yes.

15 Q. More than 20?

16 A. Yes.

17 Q. More than 50?

18 A. That's probably close.

19 Q. All right. Does CCT own any correctional
20 facilities or does it just manage those facilities?

21 A. It owns facilities also.

22 Q. Do you know how many correctional
23 facilities CCT owns?

24 A. I don't.

25 Q. Would it be close to that, close to 50

1 number? I mean, does it manage the same prisons that
2 it owns?

3 A. Yes, but I would say we manage more than
4 own.

5 Q. What about the Wheeler Correctional
6 Facility, is that owned and managed by CCT?

7 A. Yes.

8 Q. Can you explain for me the difference
9 between CoreCivic of Tennessee and CoreCivic,
10 Incorporated, in a manner in which you would explain
11 it to a fifth grader?

12 A. CoreCivic, Inc. is the parent company to
13 subsidiary CoreCivic of Tennessee.

14 Q. Does CoreCivic, Inc. directly own any
15 correctional facilities?

16 A. I am not sure.

17 Q. Do you know whether CoreCivic, Inc.
18 manages any facilities?

19 A. They -- no. They assign the management to
20 CoreCivic, Inc. who then actually operates under and
21 executes the contract.

22 MR. PETERSON: I'm sorry. I think you said
23 it manages it through CoreCivic, Inc. I am not sure
24 if you meant CoreCivic of Tennessee.

25 MR. KASPERS: Yeah, I'm having a hard time

1 Q. Was he the warden as of October 4, 2020?

2 A. Yes.

3 Q. And at the bottom of this it says,

4 CoreCivic, better the public good, correct?

5 A. Right.

6 Q. Is that the primary purpose of -- well, you
7 already answered that.

8 And does CoreCivic have any government
9 partners in the State of Georgia that you are aware
10 of?

11 A. The State of Georgia. Georgia Department
12 of Corrections. Yes.

13 Q. And what role does the Georgia Department
14 of Corrections have as it relates to the Wheeler
15 Correctional Facility?

16 A. The contract with CoreCivic to operate the
17 facility so they have oversight.

18 Q. Back to the document I showed you here, the
19 second page, second paragraph. I can hardly read it.

20 A. Yes.

21 Q. Says here, See every day we work to better
22 the public good by operating safe and secure
23 facilities, providing innovative real estate solutions
24 for our government partners, and preparing the
25 individuals in our care for re-entry. Do you see

1 that?

2 A. Yes.

3 Q. To which government partners is this letter
4 referring, do you know?

5 A. Georgia Department of Corrections.

6 Q. What level of oversight does the Georgia
7 Department of Corrections have over CoreCivic's
8 operations at the Wheeler Correctional Facility?

9 A. As outlined in the contract.

10 Q. Basically any obligations set forth in the
11 contract. I mean, the contract speaks for itself, in
12 other words, correct?

13 A. Correct.

14 Q. And when CoreCivic awarded the contract to
15 operate the Wheeler Correctional Facility, were there
16 operational guidelines in place that CoreCivic would
17 need to follow?

18 A. In place through the contract?

19 Q. Yes.

20 A. Yes.

21 Q. And some of those operational guidelines
22 provided by the Georgia Department of Corrections to
23 CoreCivic included how to maintain safety of the
24 inmates and the correctional officers, correct?

25 A. Yes.

1 A. Yes.

2 Q. If CCI's CEO determined that a warden for
3 the Wheeler Correctional Facility should be
4 terminated, do you think the warden would be
5 terminated?

6 A. Yes. Understanding that the two are the
7 same.

8 Q. The two?

9 A. That the president and CEO of CCT and CCA,
10 Inc., are the same.

11 Q. Okay. Who was -- well, that sounds like a
12 question for Donovan. Let's see.

13 Do you know who plaintiff's boss was on
14 October 4, 2020?

15 A. I don't. That would be for Donovan.

16 Q. Does -- well, CCT has policies applicable
17 to the Wheeler Corrections Facility relating to the
18 search of employees, correct?

19 A. Correct. Yes.

20 Q. And did you draft those policies?

21 A. Some I drafted. Some were collaborative.
22 Some were in place prior to me being in my position.

23 Q. How many policies are in place at the
24 Wheeler Correctional Facility as it relates to the
25 search of employees?

1 A. Two.

2 Q. And what policies are those?

3 A. The 9-20 entry and exit, and the 3-16

4 employee volunteer contract staff associates.

5 Q. And we'll start with 3-16. Do you know
6 when that policy was implemented?

7 A. Initially in February of '91.

8 Q. Has that policy changed in any substantial
9 way since then?

10 A. Yes.

11 Q. How so?

12 A. I don't have the changes in front of me,
13 but it is -- it has over the years been a bit of
14 revised -- improved.

15 Q. How about 9-20 has that -- well, when was
16 that policy implemented?

17 A. That policy was I believe initially 2009.

18 Q. And has that policy been changed in any
19 substantial way since 2009?

20 A. Yes.

21 Q. Do you know how and in what way it was
22 changed or has been changed?

23 A. Again, updated to accommodate various
24 standards, best practices in corrections, preferences
25 of individuals in charge. Those are the typical

1 Q. Do you help draft the policies and
2 procedures for all of CCT's facilities?

3 A. Yes.

4 Q. And do all of CCT's facilities have a goal
5 of keeping unauthorized items from reaching inmates?

6 A. Yes.

7 Q. Why do you think CCT has policies and
8 procedures relating to preventing inmates from
9 receiving contraband?

10 A. Due to the dangerous nature of contraband
11 coming into a correctional environment.

12 Q. Is part of a Wheeler Correctional -- well,
13 we had referenced previously the 20 hours of post
14 training. Is part of that post training related to
15 how to perform searches?

16 A. When you say post training are you
17 referring to on-the-job training?

18 Q. The Georgia post, do you remember how we
19 saw previously that the Georgia Department of
20 Corrections required all of the --

21 A. Oh, the 160 hours, the G-post certification
22 education?

23 Q. I'm talking about the 20 hours of annual
24 certification. Was that --

25 A. I am not familiar with what the 20 hours of

1 Q. Okay. Under what circumstances might an
2 employee's vehicle be searched?

3 A. There were reasonable suspicious
4 information that had came in, intelligence
5 information, if they were conducting a routine search
6 of the parking lot with the detection dogs. Those are
7 two obvious circumstances.

8 Q. When might an employee's car keys be
9 seized?

10 MR. PETERSON: Object to the form.

11 Q. Pursuant to Wheeler Correctional Facility
12 policy and procedure?

13 A. To my knowledge, we don't speak to seizing
14 of car keys in any course of the policy.

15 Q. Are there any specific steps that are
16 supposed to be followed when a CoreCivic employee
17 searches the vehicle of another CoreCivic employee?

18 A. Not from a policy perspective. Again I
19 would defer to training curriculum and Mr. Hamilton.

20 Q. As we sit here today, does CoreCivic
21 maintain that the State of Georgia had no involvement
22 into its policies and procedures relating to the
23 searches of individuals at the Wheeler Correctional
24 Facility?

25 A. That's correct.